



**Before the  
Federal Communications Commission  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Microsoft Petition for Rulemaking Seeking</b>	)	<b>ET Docket No. 14-165</b>
<b>Amendment of Part 15 of the Commission's Rules</b>	)	
<b>for Unlicensed Operations in the Television Bands,</b>	)	
<b>Repurposed 600 MHz Guard Bands and Duplex</b>	)	
<b>Gap, and Channel 37</b>	)	
	)	

**Reply Comments of  
Association of Performing Arts Professionals**

On behalf of Association of Performing Arts Professionals (APAP) and our more than 1,700 performing arts organizational and individual professional members across the country, we write to share our concerns about Microsoft Corporation's Petition for Rulemaking.<sup>1</sup>

We want to acknowledge from the outset that APAP is supportive of greater broadband connectivity in rural areas of the country. However, Microsoft's proposals would result in significantly elevated possibilities of interference to wireless microphones, cue and control devices, IFB, and assistive listening systems in use in performing arts venues across the country.<sup>2</sup> The protections that Microsoft outlines in its Petition would only be of benefit to *licensed* wireless microphone users. There are important unlicensed users of wireless microphones in rural areas that would be at risk by this proposal which are not currently eligible for Part 74 licenses, even though the Commission has recognized that they provide similar

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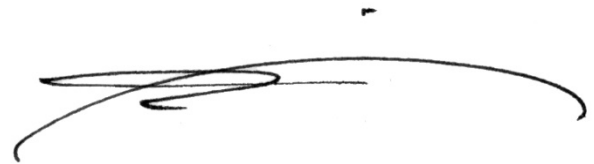
<sup>1</sup> Petition for Rulemaking of Microsoft Corporation, filed in ET Docket No. 14-165 on May 3, 2019.

<sup>2</sup> See Comments of Shure Incorporated in ET Docket No. 14-165 dated June 10, 2019.

services to the public as licensees and are eligible in every way other than the regular use of 50 or more microphones.<sup>3</sup>

Microsoft suggests increased power and mobility for White Space Devices that would not necessarily be limited to rural areas and provides that licensed wireless microphone users will be protected by the geo-location database. Our concerns are two-fold: we understand that the databases are not currently operational, and almost all of the professional, not-for-profit performing arts venues across the country – including those in rural areas – are not currently eligible for a Part 74 license. We urge the Commission not to move forward on Microsoft's proposals until (1) the White Space geolocation database is operational and effective and (2) the Commission has adopted its proposed rules to expand Part 74 licenses to worthy users.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mario Garcia Durham', with a long horizontal flourish extending to the right.

Mario Garcia Durham  
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Dated: June 25, 2019

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<sup>3</sup> See Order on Reconsideration and Further Notice of Proposed Rulemaking in ET Docket No. 14-165, July 14 2017.